Kalum Timber Supply Area
Timber Supply Review

Summary of Public Input

BC Ministry of Forests
Kalum Forest District
200-5220 Keith Avenue
Terrace, BC
V8G 1L1

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This is a summary of the public input received on the Timber Supply Review in the Kalum Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

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Background

As part of the review of timber supply in the Kalum Timber Supply Area, two opportunities were provided for public input. The first followed release of the Kalum Timber Supply Area *Data Package* and *Information Report* in January 1998. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Kalum Timber Supply Area. A 30-day review period, ending February 26, 1998, was provided for the public to comment on these documents.

On March 31, 1999, the British Columbia Forest Service released the *Kalum Timber Supply Area Analysis Report* and *Public Discussion Paper*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the 60-day review period that ended May 31, 1999.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut for the Kalum Timber Supply Area. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Kalum Forest District office in Terrace.

Public Review Process and Response

Kalum Forest District staff actively solicited public input on the Timber Supply Review in the Kalum Timber Supply Area through the following actions:

- direct mail-out of the *Information Report*, *Data Package* and *Public Discussion Paper* to 31 key organizations in the Kalum Timber Supply Area or adjacent timber supply areas.
- the *Data Package* and the *Kalum Timber Supply Area Analysis Report* were available at the district office and the Terrace and Kitimat public libraries.
- meetings regarding both the Data Package and Analysis Report were held with representatives from local government, the forest industry and other interest groups, as well as individuals.
- two meetings were held with the local newspaper to encourage articles.

As Table 1 shows, 54 individuals attended the information sessions. The Kalum Forest District also received seven written submissions on the *Data Package* and six submissions on the *Timber Supply Area Analysis Report* (see Appendix 1).

Activity (No. of participants)	Date
Information sessions	
Local government	
Terrace City Council (16)	Feb. 1998 & May 3, 1999
Kitimat Village Council (14)	Feb. 1998 & Apr. 26, 1999
Regional District of Kitimat-Stikine staff (3)	Feb. 1998 & Apr. 27, 1999

Continued

Activity (No. of participants)	Date
Interest groups	
Skeena Cellulose (5)	Feb. 1998 & May 4, 1999
West Fraser Mill (4)	Feb. 1998 & May 4, 1999
Nisga'a Interim Protection Measures Committee (12)	11-May-99

Table 1: Participation in public information activities

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the Kalum Timber Supply Area is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Area Analysis Report (and Public Discussion Paper)
- Other comments

Data Package

Land Base Factors

Several submissions comment on factors that affect the size of the timber harvesting land base.

Skeena Cellulose says sawlog content and maximum ferrying distance are more critical than merchantable volume for identifying areas suitable for helicopter logging, and requests a sensitivity analysis that includes those two factors. Bell Pole expresses support for an analysis of potential impacts of heli-logging in areas currently considered inoperable, noting that operability is a function of economics and can therefore change over time. Skeena Cellulose also asks for clarification about how much operable area results from the inclusion of non-conventional methods.

Bell Pole states its disagreement with excluding from the timber harvesting land base all stands over age 100 with volumes less than 250 cubic metres per hectare. The company says the age cut-off should be 200 years since trees may achieve that minimum volume of 250 cubic metres per hectare as they grow past the age of 100. Skeena Cellulose notes that the site index limits used to define low productivity sites appear to be low and suggests these numbers be re-examined to reflect existing harvestable constraints.

Three submissions say the estimate of 8.8 per cent to account for productivity losses from future roads, trails and landings is excessive. Skeena Cellulose provides a summary of non-productive areas from recent silviculture prescriptions and says the summary indicates a 6.1 per cent reduction to the timber harvesting land base would be more reasonable. Bell Pole says the figure of 8.8 per cent was carried forward from the previous Timber Supply Review and needs to be reviewed based on current practices.

Skeena Cellulose questions why the correlation between terrain classification and environmentally sensitive areas (for soils) was only done for terrain class V and not class IV. The company asks how deductions from the land base for environmentally sensitive areas would have been impacted by the inclusion of class IV.

Expected Rate of Growth and Productivity

Skeena Cellulose questions how the new site index figures will be incorporated into the timber supply analysis and asks for the rationale for the operational adjustment factors used. The company agrees that to define a minimum harvestable age, a minimum volume of 250 cubic metres per hectare is reasonable, but requests sensitivity analyses using minimum diameters of 20, 30 and 35 cm.

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Silviculture Systems

Kitamaat Village Council says that since educated assumptions are used throughout the section on current forest management assumptions, they should also be used to project the inclusion of partial cutting systems for the purposes of the analysis.

An individual submission says a 100-year rotation should be considered for the 880 hectares of spruce in the Kitimat Valley because there is a glut of pulp on the market now. This individual says if these stands have survived spruce weevil infestation and are healthy, they could be the basis of a strategy to re-introduce the historical stand composition.

Biodiversity

According to Skeena Cellulose, the requirements for landscape level biodiversity need clarification. The assignment of biodiversity emphasis options to landscape units is known, says this submission, but the management objectives aren't yet known.

Wildlife

Skeena Cellulose's submission says the company is unclear how wildlife netdowns will be dealt with in the analysis. The company also states its disagreement with the assumption that 70 per cent of the timber supply area has been harvested without the recommended wildlife tree retention occurring. An estimate of 50 per cent is more accurate, according to Skeena Cellulose.

BC Environment says mountain goats should be mentioned in the *Information Report*, since current practices include consideration of goat habitat.

Visually Sensitive Areas

Skeena Cellulose requests a sensitivity analysis that uses a green-up height of three metres, compared to the standard five metres.

First Nations Issues

An individual submission states opposition to further clearcut logging, especially in the Jesse Lake and Wathlsto Creek watersheds, and in general is concerned that the Haisla people receive very little economic benefit from harvesting in their territory. This individual asks for a commitment that this issue will be considered in future land use decisions.

Kitamaat Village Council ask for a wording change so that the results of impact assessments and traditional-use surveys will be "implemented" not just "considered" in the Timber Supply Review. The Council also requests that silviculture jobs be separated from logging-related jobs in the analysis.

Community Dependence

The City of Terrace's economic development officer says the economic profile in the *Information Report* understates the importance of forestry to the region and especially to Terrace where 18 per cent of the labour force is directly employed in the forest industry. According to this submission, the inclusion of Kitimat in the regional labour force skews the figures. This submission also expresses the opinion that the figures for indirect and induced jobs are extremely underestimated, noting that the usual multiplier is 2.

Timber Supply Area Analysis Report

Existing Forest Inventory

In its submission, Skeena Cellulose says timber supply over the next several decades is very sensitive to uncertainty in estimates of existing stand volumes. The company says overestimation is possible due to uncertainties in inventory classifications and issues around decay, waste and breakage factors. As well, this submission notes that historical harvested volumes are lower than inventory volume estimates.

Site Productivity Estimates

The Nisga'a Tribal Council submission notes that the base case scenario incorporates the findings of a study on the productivity of managed hemlock stands. Referring to the study, the Council says the productivity adjustments suggested by the study only apply where management practices ensure that stands are free from factors that hinder tree growth, such as competition from pests and other vegetation. Since current forest management practices do not ensure these conditions, the Council says it is premature to adjust estimates of site productivity for regenerated stands of hemlock.

Land Base Factors

Skeena Sawmills expresses concern there are no area reductions for environmentally sensitive areas for recreation (Er), wildlife (Ew) and watershed (Eh) values. The company acknowledges that forest cover requirements may be acceptable to account for Er values, but is of the opinion that some reduction for Eh appears necessary, given the number of areas of water use in the Kalum Timber Supply Area. This submission also says a 50 per cent reduction for environmentally sensitive areas appears low based on a small sample.

Skeena Sawmills also comments on the reduction from the land base for future roads, trails and landings. The company says the 8.8 per cent reduction appears overestimated and that soil disturbance does not necessarily correlate with loss of productivity.

The City of Terrace expresses concern that while the size of the timber harvesting land base may be larger than estimated, it may also be smaller. The City says the increasing cost of harvesting some areas could have significant impacts on the long-term allowable annual cut, and therefore harvesting costs should be a priority for the Forest Service. The City also notes that the removal of First Nations land claim areas from the Kalum Timber Supply Area does not necessarily imply its removal from the region's timber supply.

Biodiversity and Wildlife

Skeena Cellulose states its agreement with 10 per cent retention of trees in riparian management zones. The company notes that the analysis didn't provide for any retention along smaller streams (classes S4, S5 and S6) and questions what the impact on timber supply would be if retention were applied to these stream classes. As well, Skeena Cellulose says it would agree that 75 per cent of the requirements for wildlife tree patches can be met outside the timber harvesting land base if a 10 per cent retention were applied to S4, S5 and S6 streams.

Skeena Cellulose also notes that critical wildlife habitat outside riparian management areas and its impact on timber supply is not adequately addressed in the analysis. The company questions how early seral requirements were applied in the sensitivity analysis and requests a copy of that analysis by landscape unit.

Other Comments

Several submissions commented on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Timber Supply Review Process

The City of Terrace says the Timber Supply Review should recognize that its primary purpose is to provide an environment of long-term stability and therefore it must incorporate an estimate of impacts from impending decisions (e.g., the Nisga'a Treaty, LRMPs). This will help the public understand the impacts of various decisions, in the City's opinion. Bell Pole's submission requests a sensitivity analysis of the impacts of the Nisga'a Treaty. The City of Terrace also says the Timber Supply Review must be improved as a public policy tool that identifies challenges to and rewards for timber supply increases.

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The Nisga'a Tribal Council says one of the goals of the Timber Supply Review process is to identify where more information is needed to better manage forest resources. The Council notes that the process has failed to address the pine mushroom industry, both its economic contribution and its effect on the timber harvesting land base. The Council says regulation of the pine mushroom resource is inevitable and urges the Ministry of Forests to start addressing this issue.

The District of Kitimat expresses its appreciation for the open and inclusive process, and confidence that decisions will take into account broader public interests.

Skeena Cellulose says a 20-year plan would be beneficial to confirm the proposed base case, as it would show if the projected harvest volume can be located on the landscape.

BC Environment recommends a number of changes to the sensitivity analyses proposed in the *Data Package* and Skeena Sawmills notes several minor errors in the *Analysis Report.*

Harvest Levels

The City of Terrace expresses its support for maximizing the allowable annual cut within the confines of a "sustainable" harvest level so forest sector activity levels and employment can be maintained or increased. Both the City and the Regional District of Kitimat-Stikine support maintenance of the allowable annual cut at current levels and urge that more resources be allocated for research on topics such as site productivity so harvest levels can be maintained or increased in the future.

The Nisga'a Tribal Council are of the opinion that a significant downward adjustment to the allowable annual cut is urgently required due to the long history of overcutting and mismanagement of Nisga'a forests.

Appendix 1

Submissions received by the Kalum Forest District

Submissions received on the Data Package

First Nations
Kitamaat Village Council

Local government
City of Terrace

Government agencies
BC Environment

Industry
Skeena Cellulose Inc., Terrace
Bell Pole Company, Terrace

General public
two individual submissions

Submissions received on the Timber Supply Area Analysis Report

First Nations
Nisga'a Tribal Council

Local government
Regional District of Kitimat-Stikine
District of Kitimat
City of Terrace

Industry
Skeena Cellulose Inc., Terrace
Skeena Sawmills (West Fraser Mills Ltd.), Terrace